

Amendment MUR 6477

# JANICE★HAHN

## FOR CONGRESS

June 23, 2011

Christopher Hughey, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

MUR #

6477

OFFICE OF GENERAL  
COUNSEL

2011 JUL -5 AM 10:52

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Dear Mr. Hughey:

Pursuant to 2 U.S.C. § 437g, we urge the Federal Election Commission ("FEC" or "Commission") to undertake an immediate investigation and enforcement action against Craig Huey, Friends of Craig Huey for Congress and Turn Right USA for violations under the Federal Election Campaign Act of 1971, as amended, and Commission regulations. Furthermore, given the seriousness of the violations alleged and their proximity to the July 12, 2011 special runoff election, we request that the matter be referred to the United States Attorney's Office, Public Integrity Section for simultaneous criminal investigation to protect the integrity of the election process and the Federal Election Campaign Act.

### FACTS

Turn Right USA is a brand new "Super PAC" which filed papers as an Independent Political Action Committee on June 13, 2011, according to the FEC. These PACs are permitted to raise and spend unlimited amounts of money, provided that they have no communication or coordination with the campaign they aid and that they do not use such funds to make contributions to federal candidates. On June 14, 2011 Turn Right USA released an incendiary racist and sexist ad attacking Councilwoman Janice Hahn, candidate for the recent 36<sup>th</sup> California Congressional seat.

Turn Right USA lists its official address at 18016 South Western Ave., Gardena, CA 90248. Previous FEC filings from as recently as May 2010 list an organization at that very address named CampaignLA. CampaignLA's website ([www.campaignla.com](http://www.campaignla.com)) describes the organization as "a one-stop, vertically integrated political campaign shop, which means we have all our resources in one place." Craig Huey's latest FEC disclosure report names CampaignLA as one of their vendors.

Moreover, a standard DNS search (Domain Name Server) for the TurnRightUSA.org website identifies [doug@campaignla.com](mailto:doug@campaignla.com) as the website's registered agent for the "independent" committee. Additionally, the records list "campaignla.com" as one of two "RELATED DOMAINS FOR TURNRIGHTUSA.ORG." (See attached DNS Search records, conducted on <http://www.who.is/>.)

Furthermore, door-to-door canvassers working for Craig Huey's campaign have been discovered hand delivering a DVD containing footage identical to that used in Turn Right USA's ad throughout

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the district. The DVD is deceptively portrayed as part of a message about gang activity from the LAPD, with an attached note from a retired LAPD Sergeant, replete with fake badge. The canvassers have been distributing the footage as votes are being cast by mail.

### COMPLAINT

As such, the Janice Hahn for Congress officially calls for a full investigation of the following possible violations of the Federal Election Campaign Act and Commission regulations by Craig Huey, Friends of Craig Huey for Congress and Turn Right USA, and further requests that the matter be referred to the United States Attorney's Office (Public Integrity Section) for simultaneous criminal investigation:

1. Turn Right USA has paid for a coordinated communication under 11 C.F.R. § 109.21, thereby making a prohibited contribution to the Craig Huey campaign in violation of 2 U.S.C. § 441a.
2. Craig Huey and Friends of Craig Huey for Congress have received a prohibited contribution from Turn Right USA in violation of 2 U.S.C. § 441a and § 441i(e) via a coordinated communication.
3. Turn Right USA has violated the Commission's disclaimer regulations at 11 C.F.R. § 110.11 by falsely stating that the advertisement in question is "NOT authorized by any candidate or candidate's committee."

We strongly urge the FEC to conduct an immediate investigation into these allegations, declare that Craig Huey, Friends of Craig Huey for Congress and Turn Right USA have violated the Federal Election Campaign Act of 1971, as amended, and Commission regulations, impose sanctions appropriate to these violations and take such further action as may be appropriate.



Dave Jacobson  
Campaign Manager, Janice Hahn for Congress  
2513 Pacific Coast Hwy.  
Torrance, CA 90717

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VERIFICATION

I hereby verify that the statements made in the attached complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

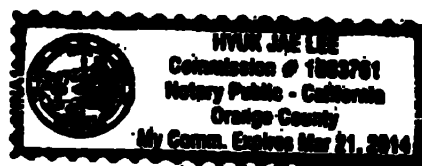


Dave Jacobson

Sworn to and subscribed before me on this 23 day of June, 2011.



Notary Public



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